



Responsible Investment & Stewardship Policy

Purpose and Scope

At Webster Equity Partners ("Webster"), responsible investment (RI) is part of our investment philosophy and stewardship approach. We believe that financially material sustainability factors can meaningfully influence long-term business performance, risk-adjusted returns, and stakeholder alignment. Our approach is grounded in fiduciary duty, long-term capital stewardship, and disciplined investment management.

This Responsible Investment & Stewardship Policy (Policy) outlines our approach to evaluating and managing sustainability risks and opportunities across the investment lifecycle: from origination and diligence through to ownership and exit. It reflects our commitment as a signatory to the Principles for Responsible Investment (PRI) and our belief in responsible stewardship as a lever for long-term value protection or creation.

Webster's RI framework is supported by additional governance and stewardship policies addressing areas such as sustainability diligence, governance oversight, human rights, incident escalation, and responsible technology use.

Note: References to "material" and "sustainability" in this Policy reflect Webster's internal risk and investment frameworks and do not correspond to legal or regulatory definitions under U.S. federal securities laws, the European Union (EU) Sustainable Finance Disclosure Regulation (SFDR), EU Taxonomy, or other jurisdiction-specific similar regulatory frameworks.

Our Commitment

We focus on investments that align with our strategic and fiduciary objectives and seek to avoid investments that we believe are inconsistent with our strategic, fiduciary, and stewardship objectives. We aim to:

- Integrate financially material sustainability factors into investment processes.
- Align our practices with PRI's six principles.
- Promote responsible investment within the private equity industry.
- Collaborate with peers on stewardship and transparency.
- Report regularly and accurately to our investors.

Guiding Principles

We recognize that sustainability risks and opportunities are dynamic and context specific. As such, our RI approach is pragmatic, iterative, and tailored by sector, geography, and strategy. We meet companies where they are, support their progress, and adapt our approach based on material financial risks and opportunities, sector-specific and regulatory developments, and operational resilience and stakeholder needs. Our approach emphasizes financial materiality, fiduciary alignment, and operational relevance.

RI Integration Across the Investment Lifecycle

We seek to integrate sustainability and responsible investment considerations throughout the investment lifecycle:

Pre-Investment

In the early stages of the investment process, our teams work collaboratively with internal and external experts to evaluate sustainability risks and opportunities alongside broader strategic and financial considerations. We draw

on sector-specific insights, including thematic and patient-centric lenses that are tailored to healthcare, to shape our investment theses and diligence processes. Our approach is anchored in strategic, fact-based assessments designed to uncover material risks and value drivers. The scope and depth of diligence are adjusted based on deal complexity, timeline, and the company's business model.

During pre-investment diligence, we use the IFRS Foundation's Sustainability Accounting Standards Board (SASB) sector guides to identify and prioritize relevant sustainability topics. This structured methodology enables us to surface issues that could influence business performance, stakeholder trust, or long-term value. We also assess the management team's ability and willingness to align with Webster's sustainability expectations and governance standards. Investment decisions are reached through a series of Investment Committee (IC) meetings informed by a review of diligence findings and recommendations.

Post-Investment

Once an investment is made, we engage actively with portfolio companies to integrate and advance sustainability priorities during the ownership period. Our approach is customized to each company's sector, level of maturity, and governance structure. We engage with management teams on governance, regulatory developments, and responsible innovation. Performance is monitored through tailored, risk-based key performance indicators that reflect both enterprise risk and impact potential. Where relevant, these KPIs may also help inform Webster's stewardship priorities and assessment of sustainability-related outcomes associated with portfolio company operations. Webster seeks to support portfolio companies in developing governance structures and practices intended to support continued progress beyond our ownership period. To that end, Webster seeks to work through appropriate governance structures.

Exit

As part of exit planning, Webster increasingly works with portfolio companies to document and communicate sustainability-related initiatives and progress to prospective buyers. We recognize that responsible business practices may differentiate companies in competitive sale processes and we seek to have their achievements appropriately reflected in exit narratives.

Guidance on Sustainability Factors

Our definition of sustainability includes environmental, social, governance, and systemic factors relevant to long-term enterprise value and resilience. Similarly, "material" factors are defined as those factors that Webster believes may meaningfully affect an investment's ability to create, preserve or erode long-term economic value, for the company and its stakeholders. Material sustainability factors vary by company and context, and may appear during diligence, ownership, or stewardship activities. The Firm's customized, thematic approach to responsible investment integration is adapted to both the healthcare sector and the specific control and capital structure of each investment. We seek to collect data that is tailored and relevant to the company, sector, or investment, and make reasonable efforts to support the accuracy and reliability of such information across portfolio companies.

Examples of key topics include:

- **Environmental:** Legal permits, waste and energy management, climate-related risks.
- **Social:** Access to care, patient experience and outcomes, quality of services, drug safety, clinical trial practices, human capital management, equal employment opportunities and inclusive cultures, occupational health & safety and employee well-being, labor relations & labor practices, and responsible marketing.
- **Governance:** Board composition, conflicts of interest management, business ethics, data privacy & security, compliance, incident and risk management.

Systemic themes include:

- **Good Governance:** Appropriate governance frameworks.

- **Climate Change:** Physical and transition risks and resilient business operations.
- **Human Rights:** Responsible practices around access to care, data privacy, inclusive and safe workplace cultures, and ethical clinical practices (such as equitable patient access considerations, informed patient choice, and practices intended to support patient and worker wellbeing and safety).
- **Cybersecurity:** Cybersecurity and data protection frameworks.
- **Responsible Innovation:** The responsible and ethical use of AI, digital tools, and health technology to support care delivery while respecting patient rights, supporting data privacy, and mitigating discriminatory or unintended harms.
- **Workforce Resilience:** The well-being, retention, and safety of healthcare workers, and workplace practices intended to support safe, fair, and inclusive working conditions for employees and contractors, as a critical enabler of system stability and patient outcomes.

A financial product may also promote social characteristics, such as better healthcare access or improved patient experience, even if these are not its primary objective, as described in the product’s Private Placement Memorandum (PPM). While outcomes vary by company, are influenced by external factors, and cannot be guaranteed, we promote these goals through active stewardship and by encouraging improvements in healthcare that aim to deliver strong returns.

Stewardship Approach & Activities

Webster’s stewardship model reflects our role as active owners. We use our influence to support sustainable, long-term value creation by working collaboratively with management teams and board members. We prioritize our stewardship efforts based on the materiality of issues, the opportunity to mitigate risk or unlock value, and the level of control or governance rights we hold. Our engagements are informed by insights from across our stakeholder network, including investors, company leadership, employees, and payors.

We use a range of stewardship tools, including:

- **Governance Rights:** We use our governance rights and board-level influence to support accountability, sound governance practices, and long-term value creation.
- **Engagement:** We seek to maintain regular, constructive dialogue with company leadership to encourage adoption of sound governance and sustainability practices.
- **Integration:** We embed responsible investment considerations into the core of our investment processes, from diligence through monitoring.
- **Collaborative Engagement:** We partner with industry peers, when appropriate, to share perspectives, promote stewardship dialogue, and learn from others.
- **Escalation:** Where appropriate, we may escalate material concerns through enhanced engagement, formal discussions with management, governance dialogue, or board-level channels.

We recognize the potential for conflicts of interest and are guided by our Firm’s Conflict of Interest Policy to manage such risks.

Transparency & Reporting

We are committed to transparent communication with our investors. We report at least annually on the implementation and progress of our responsible investment activities and seek to provide transparent and decision-useful communication to investors.

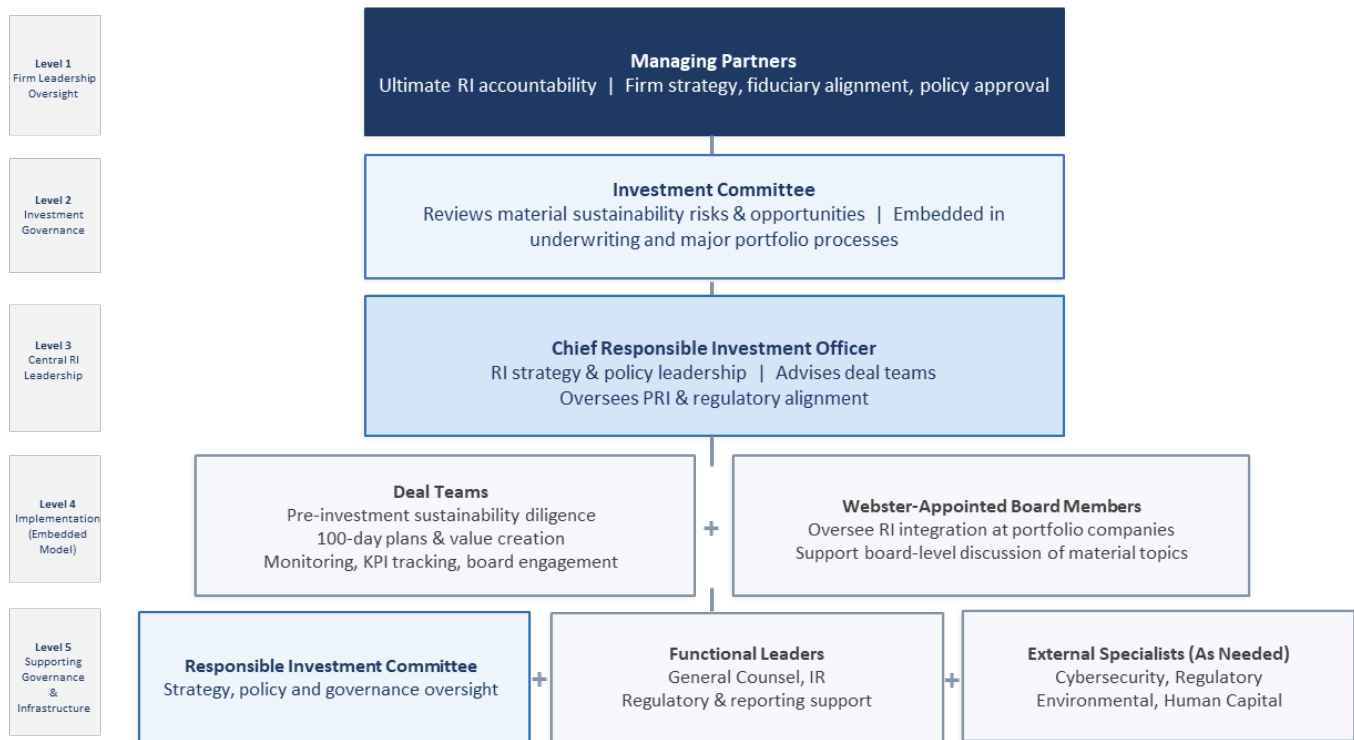
In the event of a critical sustainability incident, Webster will notify relevant limited partners in accordance with our Critical Incident Management Policy, which governs the definition, escalation, and LP communication process for such events.

Disclosure will only occur where legally permissible and consistent with confidentiality requirements.

RI Governance Framework

Webster’s RI governance framework is designed to support accountability, oversight, and integration across the investment lifecycle through a combination of firm leadership, investment governance, dedicated RI leadership, embedded deal team integration, and supporting governance infrastructure. These structures combine centralized oversight with an embedded implementation model tailored to investment characteristics, governance rights, and portfolio company maturity.

Figure 1. Webster Responsible Investment Governance Framework



Roles & Responsibilities

We believe responsible investment should be supported by both dedicated in-house expertise and shared responsibility across our teams:

- **Managing Partners:** Oversee the Firm’s responsible investment strategy, resourcing, and PRI alignment.
- **IC:** Review and approve investments, including assessment of material sustainability risks or opportunities (among other factors).
- **Responsible Investment Committee:** Supports oversight of Webster’s responsible investment framework, implementation structures, and program performance.
- **Chief Responsible Investment Officer (CRIO):** Lead RI strategy, support integration efforts, advise deal teams, and provide subject matter expertise to portfolio companies.
- **General Counsel:** Advises on legal and regulatory matters relevant to Webster’s responsible investment activities.
- **Managing Director, Investor Relations and Fund Administration:** Support investor transparency, LP engagement, and communication regarding Webster’s responsible investment activities and obligations.

- **Investment Teams:** Support RI integration during diligence, ownership, monitoring, and performance tracking activities.
- **Portfolio Company Management:** Lead implementation of governance and sustainability-related initiatives, monitor outcomes, and report progress.
- **Webster Leads on Board of Directors:** Provide governance oversight and reinforce the Firm’s RI expectations through governance channels.

Accountability Mechanisms

To reinforce accountability, Webster incorporates responsible investment considerations into its broader discretionary bonus framework. RI-related factors may be considered alongside financial, operational, leadership, and strategic performance considerations in discretionary bonus determinations, in accordance with Webster’s Responsible Investment Integration in Bonus Considerations Policy.

Scope, Limitations & Legal Clarifications

This Policy applies to all Webster investments from the date of adoption and is implemented in accordance with applicable laws, fiduciary duties, and investment strategy.

Our ability to influence sustainability factors varies by investment, based on strategy, ownership stake, governance rights, and information access. Accordingly, RI integration is applied where feasible and appropriate. Responsible investment features or designations, where relevant, are outlined in fund-specific documentation.

Webster uses reasonable efforts to follow its procedures to identify and mitigate sustainability risks but does not guarantee full identification or resolution. Sustainability and/or responsible investment goals are aspirational in nature and not guarantees. We expect our approach to evolve in line with industry standards and stakeholder expectations.

This policy will be reviewed regularly to reflect strategic priorities, regulatory developments, and stakeholder expectations. Last updated: May 2026.

References:

Webster’s responsible investment framework is supported by additional governance, stewardship, diligence, and oversight policies intended to support integration and implementation across the investment lifecycle, including:

1. Good Governance Policy
2. Sustainability Diligence Policy
3. Human Rights Policy
4. Responsible GenAI Use Code of Ethics
5. Critical Incident Management Policy
6. Portfolio Company Governance Baseline and Remediation Directive
7. Responsible Investment Integration in Bonus Considerations Policy
8. Director Charter and Engagement Protocols

Revision History:

Revision	Date	Author	Evolution Highlights
v6.0	May 2026	CRIO	Calibration-informed refinement and systems strengthening
v5.0	May 2025	CRIO	Stewardship maturation and lifecycle integration
v4.0	February 2024	CRIO	Institutionalization and accountability enhancements
v3.0	April 2023	CRIO	Broader responsible investment transition
v2.0	October 2021	CRIO	PRI integration and stewardship expansion
v1.0	October 2018	External ESG Advisor with Webster Management	Foundational ESG diligence and governance framework